

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CRIMINAL NO: 4:24-CR-543-2
	§	
JOHN SBLENDORIO	§	

MOTION FOR JENCK'S ACT MATERIAL

TO THE HONORABLE JUDGE OF SAID COURT:

Now comes, JOHN SBLENDORIO, Defendant in the above entitled and numbered action, by and through his Attorney of record, Anthony P. Troiani, and hereby makes and files this Jenck's Act motion requesting that the Government be required to have any statements, notes, or reports made by any witness who testifies on behalf of the Government be reduced to writing and available to tender to defense counsel immediately after the witness testimony for the purpose of cross-examination and by way of this motion, this Defendant would show unto the court as follows:

1. This request is made under the authority of 18 USC section 3500.

2. Requiring the Government to have this Jenck's material prepared and available for immediate tender works no hardship on the Government and will greatly expedite cross-examination.

3. Without this material immediately available, the defendant will be prejudicially harmed and will be denied effective assistance of counsel.

WHEREFORE PREMISES CONSIDERED, Defendant prays Motion for Jenck's Act Material be in all things granted.

Respectfully submitted,

By: /s/ Anthony P. Troiani
Anthony P. Troiani
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Attorney for Defendant
JOHN SBLENDORIO

CERTIFICATE OF SERVICE

I, Anthony P Troiani, Attorney for Defendant, JOHN SBLENDORIO hereby certify that a true and correct copy of said Motion for Jenck's Act Material has been served on to Hon. Byron Black, Assistant United States Attorney at 1000 Louisiana, Suite 2300, Houston, Texas 77002 on this the 8th day of November 2024.

/s/ Anthony P. Troiani

Anthony P. Troiani

CERTIFICATE OF CONFERENCE

Counsel conferred with the Government on November 7, 2024, and the Government is opposed to the filing of this motion.

/s/ Anthony P. Troiani

Anthony P. Troiani